



February 16, 2024

VIA ECF

Hon. Paul A. Crotty
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Mills v. New York City, 23 Civ. 7460 (PAC)(OTW)

Dear Judge Crotty,

I represent the plaintiffs, Charles Mills, Craig Sotomayor, and Braden Holliday, in the above-referenced matter.

For the Court's reference in determining the veracity of the representations made regarding the definitions of the words "infringe" and "abridge" at the time of the ratification of the Bill of Rights in 1791, the Founding Era of American history, I herein provide the Court with copies of the relevant definitions as set forth in the first American dictionary as published by Noah Webster in 1806, "A Compendious Dictionary of the English Language."¹

Attached please find true and accurate copies of the pages containing the definitions of the words "abridge," "infringe," "break," "transgress," and "violate." As the Court will see, "infringe" did not mean a complete prohibition or ban; rather, to "break," "transgress," or "violate" was sufficient to constitute an infringement.

Should the Court require additional definitions from the publication, please advise.

Very truly yours,

Amy L. Bellantoni
Amy L. Bellantoni

cc: Nicholas Ciappetta (via ECF)

¹ <https://www.merriam-webster.com/about-us/americas-first-dictionary>

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